

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA**

M.D., Individually; et al.,  Plaintiffs,  vs.  DANNETTE SMITH, Chief Executive Officer of the Department of Health and Human Services, Individually; et al.;  Defendants.	<p style="text-align: center;"><b>4:21CV3315</b></p> <p style="text-align: center;"><b>STIPULATED PROTECTIVE ORDER</b></p>
J.P., as Next Friend of A.S.W., et al.,  Plaintiffs,  vs.  STATE OF NEBRASKA, et al.,  Defendants.	<p style="text-align: center;"><b>4:22CV3095</b></p> <p style="text-align: center;"><b>STIPULATED PROTECTIVE ORDER</b></p>

THIS MATTER came before the Court upon the Joint Stipulation for Entry of a Protective Order ([Filing No. 81](#)). The Court finds that said Motion should be granted and is hereby ordered as follows:

1. The expert report served upon the defendants shall be confidential and shall not be discussed, produced or disseminated to anyone who is not a party to this case except for a party's legal counsel and their staff, and expert witnesses or consultants retained by the parties for this case. Further, said expert witnesses or consultants shall be informed that the report is confidential.
2. The identity of the expert witness together with his curriculum vitae and his listing of cases in which he has previously testified shall not be confidential information.
3. The deposition of any plaintiff that is taken by the defendants shall be confidential. The depositions may only be shown and shared with expert witnesses retained by the defendants.

4. At the conclusion of this case, within a reasonable time, the expert report and the depositions in custody of the defendants shall be destroyed or delivered to the plaintiffs' counsel.

IT IS SO ORDERED.

DATED this 23<sup>rd</sup> day of August, 2024.

BY THE COURT:

s/Michael D. Nelson  
United States Magistrate Judge